

BROWN & CONNERY, LLP

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Attorneys for SAP Industries, Inc., SAP America, Inc., Sybase, Inc.,

Ariba, Inc., and Concur Technologies, Inc.

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

)
In re:) Chapter 11
)
SEARS HOLDINGS CORPORATION, et al.,¹) Case No. 18-23538 (RDD)
)
Debtors.) (Jointly Administered)
)

**NOTICE OF APPEARANCE AND REQUEST
FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Brown & Connery, LLP, subject to the limitations and conditions set forth hereafter, appears for creditors and parties-in-interest SAP Industries, Inc.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

and its affiliates SAP America, Inc., Sybase, Inc., Ariba, Inc., and Concur Technologies, Inc. (collectively, “SAP”) in the above-captioned administratively consolidated proceedings (the “Chapter 11 Cases”).

PLEASE TAKE FURTHER NOTICE that, pursuant to § 1109(b) of the Bankruptcy Code and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Brown & Connery, LLP requests that all pleadings, documents and notices (including, without limitation, not only those pleadings, documents, and notices referred to in Bankruptcy Rule 2002, but also any orders, applications, motions, petitions, requests, complaints, answers, replies, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, disclosure statements or demands, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile, e-mail or otherwise) filed, given, or to be given in the Chapter 11 Cases be given and served upon:

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PLEASE TAKE FURTHER NOTICE that neither this notice, any subsequent appearance (by pleading or otherwise), nor any participation in or in connection with the Debtors’ Chapter 11 cases is intended to be, or shall be construed as a consent or waiver of SAP (i) to personal jurisdiction of the bankruptcy court; (ii) of the right to have final orders in non-core matters entered only after review *de novo* by a District Court judge; (iii) of the right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related thereto; (iv) of the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (v) of any other rights, claims, actions, defenses, setoffs or

recoupments, all of which rights, actions, setoffs, defenses and recoupments are expressly reserved.

BROWN & CONNERY, LLP

Dated: November 19, 2018

/s/ Julie F. Montgomery

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